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**DEFENDANTS', WHITTEN & YOUNG, P.C., CHARLES C. SELF III  
and DONALD L. ANDERSON'S FIRST AMENDED ANSWER**

1. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 1 of Plaintiffs' Second Amended Complaint.
2. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 2 of Plaintiffs' Second Amended Complaint.
3. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 3 of Plaintiffs' Second Amended Complaint.
4. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 4 of Plaintiffs' Second Amended Complaint.
5. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 5 of Plaintiffs' Second Amended Complaint.
6. Defendants admit that venue is proper in this District. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 6 of Plaintiffs' Second Amended Complaint.
7. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 7 of Plaintiffs' Second Amended Complaint.

8. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 8 of Plaintiffs' Second Amended Complaint.

9. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 9 of Plaintiffs' Second Amended Complaint, except that Defendants deny any allegation that they conspired with anyone.

10. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 10 of Plaintiffs' Second Amended Complaint, except that Defendants deny any allegation that they conspired with anyone.

11. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of the first two sentences of paragraph 11 of Plaintiffs' Second Amended Complaint. Defendants admit that Courtroom Data Solutions, Inc. was previously known as StenoScribe, Inc., and that it changed its name in late 2003. Defendants deny the remainder of paragraph 11.

12. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 12 of Plaintiffs' Second Amended Complaint.

13. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 13 of Plaintiffs' Second Amended Complaint.

14. Defendants admit the allegations of the first sentences of paragraph 14. Defendants admit that Weeks was acting as a State of Texas District Judge. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 14 of Plaintiffs' Second Amended Complaint.

15. Defendants admit that Victoria L. Carter is an attorney, and previously represented Hutchison. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 15 of Plaintiffs' Second Amended Complaint.

16. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 16 of Plaintiffs' Second Amended Complaint. Defendants admit that Plaintiff is an individual. Defendants admit that Plaintiff was the sole incorporator of CDS.

17. Defendants admit that Plaintiff is an individual. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 17 of Plaintiffs' Second Amended Complaint.

18. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 18 of Plaintiffs' Second Amended Complaint.

19. Defendants admit that Claudia Hutchison is an individual. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 19 of Plaintiffs' Second Amended Complaint..

20. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 20 of Plaintiffs' Second Amended Complaint.

21. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 21 of Plaintiffs' Second Amended Complaint.

22. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 22 of Plaintiffs' Second Amended Complaint.

23. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 23 of Plaintiffs' Second Amended Complaint.

24. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 24 of Plaintiffs' Second Amended Complaint.

25. Defendants admit the allegations in paragraph 25.

26. Defendants admit the allegations of paragraph 26. Deny as to the date.

27. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 27 of Plaintiffs' Second Amended Complaint.

28. Defendants admit the allegations in paragraph 28 of Plaintiffs' Second Amended Complaint.

29. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 29 of Plaintiffs' Second Amended Complaint.

30. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 30 of Plaintiffs' Second Amended Complaint, except that Defendants deny that they discriminated against Plaintiffs or any member of Plaintiffs' religion.

31. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 31 of Plaintiffs' Second Amended Complaint.

32. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 32 of Plaintiffs' Second Amended Complaint.

33. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 33 of Plaintiffs' Second Amended Complaint.

34. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 34 of Plaintiffs' Second Amended Complaint.

35. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 35 of Plaintiffs' Second Amended Complaint.

36. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 36 of Plaintiffs' Second Amended Complaint.

37. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 37 of Plaintiffs' Second Amended Complaint.

38. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 38 of Plaintiffs' Second Amended Complaint.

39. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 39 of Plaintiffs' Second Amended Complaint.

40. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 40 of Plaintiffs' Second Amended Complaint.

41. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 41 of Plaintiffs' Second Amended Complaint.

42. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 42 of Plaintiffs' Second Amended Complaint.

43. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 43 of Plaintiffs' Second Amended Complaint.

44. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 44 of Plaintiffs' Second Amended Complaint.

45. Defendants admit the allegation in paragraph 45.

46. Defendants admit the allegations in paragraph 46.

47. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 47 of Plaintiffs' Second Amended Complaint.

48. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 48 of Plaintiffs' Second Amended Complaint.

49. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 49 of Plaintiffs' Second Amended Complaint.

50. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 50 of Plaintiffs' Second Amended Complaint.

51. Defendants admit the allegation in paragraph 51.

52. Defendants admit the allegation in paragraph 52.
53. Defendants admit the allegation in paragraph 53.
54. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 54 of Plaintiffs' Second Amended Complaint.
55. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 55 of Plaintiffs' Second Amended Complaint.
56. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 56 of Plaintiffs' Second Amended Complaint.
57. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 57 of Plaintiffs' Second Amended Complaint.
58. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 58 of Plaintiffs' Second Amended Complaint.
59. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 59 of Plaintiffs' Second Amended Complaint.
60. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 60 of Plaintiffs' Second Amended Complaint.
61. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 61 of Plaintiffs' Second Amended Complaint.
62. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 62 of Plaintiffs' Second Amended Complaint.
63. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 63 of Plaintiffs' Second Amended Complaint.
64. Defendants admit the allegation in paragraph 64.
65. Defendants admit the allegation in paragraph 65.
66. Defendants admit the allegation in paragraph 66.
67. Defendants admit the allegation in paragraph 67.
68. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 68 of Plaintiffs' Second Amended Complaint.
69. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 69 of Plaintiffs' Second Amended Complaint.
70. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 70 of Plaintiffs' Second Amended Complaint.
71. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 71. Otherwise, the allegations in paragraph 71 are denied.
72. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 72. Otherwise, the allegations in paragraph 72 are denied.
73. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 73 of Plaintiffs' Second Amended Complaint.
74. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 74 of Plaintiffs' Second Amended Complaint.
75. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 75 of Plaintiffs' Second Amended Complaint.
76. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 76 of Plaintiffs' Second Amended Complaint.
77. Defendants admit the allegations in paragraph 77.

78. Defendants admit the first sentence of paragraph 78. Defendants admit that no writ of mandamus was filed in the state court case. Defendants admit that Anderson acted as co-counsel for CDS and Hawkins. Otherwise, the allegations of paragraph 78 are denied.

79. Defendants admit receiving the Verified Complaint, as attorneys for Hawkins and CDS. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 79 of Plaintiffs' Second Amended Complaint.

80. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 80 of Plaintiffs' Second Amended Complaint.

81. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 81 of Plaintiffs' Second Amended Complaint.

82. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 82 of Plaintiffs' Second Amended Complaint.

83. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 83 of Plaintiffs' Second Amended Complaint.

84. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 84 of Plaintiffs' Second Amended Complaint.

85. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 85 of Plaintiffs' Second Amended Complaint.

86. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 86 of Plaintiffs' Second Amended Complaint.

87. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 87 of Plaintiffs' Second Amended Complaint.

88. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 88 of Plaintiffs' Second Amended Complaint.

89. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 89 of Plaintiffs' Second Amended Complaint.

90. Defendants admit the allegation in paragraph 90.

91. Defendants admit the allegation in paragraph 91.

92. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 92 of Plaintiffs' Second Amended Complaint.

93. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 93 of Plaintiffs' Second Amended Complaint.

94. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 94. Otherwise, the allegations in paragraph 94 are denied.

95. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 95. Otherwise, the allegations in paragraph 95 are denied.

96. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 96. Otherwise, the allegations in paragraph 96 are denied.

97. Defendants admit that they objected to the order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 97 of Plaintiffs' Second Amended Complaint.

98. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 98 of Plaintiffs' Second Amended Complaint.

99. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 99. Otherwise, the allegations in paragraph 99 are denied.

100. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 100. Otherwise, the allegations in paragraph 100 are denied..

101. Defendants admit the individually numbered allegations of the contents of the Order as stated in paragraph 101. Otherwise, the allegations in paragraph 101 are denied.

102. Defendants deny the allegations in paragraph 102.

103. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 103 of Plaintiffs' Second Amended Complaint.

104. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 104 of Plaintiffs' Second Amended Complaint.

105. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 105 of Plaintiffs' Second Amended Complaint.

106. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 106 of Plaintiffs' Second Amended Complaint.

107. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 107 of Plaintiffs' Second Amended Complaint.

108. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 108 of Plaintiffs' Second Amended Complaint.

109. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 109 of Plaintiffs' Second Amended Complaint.

110. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of the first sentence of paragraph 110 of Plaintiffs' Second Amended Complaint. However, Defendants admit the second sentence.

111. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 111 of Plaintiffs' Second Amended Complaint.

112. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 112 of Plaintiffs' Second Amended Complaint.

113. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 113 of Plaintiffs' Second Amended Complaint.

114. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 114 of Plaintiffs' Second Amended Complaint.

115. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 115 of Plaintiffs' Second Amended Complaint.

116. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 116 of Plaintiffs' Second Amended Complaint.

117. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 117 of Plaintiffs' Second Amended Complaint.

118. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 118 of Plaintiffs' Second Amended Complaint.

119. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 119 of Plaintiffs' Second Amended Complaint.

120. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 120 of Plaintiffs' Second Amended Complaint.

121. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 121 of Plaintiffs' Second Amended Complaint.

122. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 122 of Plaintiffs' Second Amended Complaint.

123. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 123 of Plaintiffs' Second Amended Complaint.

124. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 124 of Plaintiffs' Second Amended Complaint.

125. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 125 of Plaintiffs' Second Amended Complaint.

126. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 126 of Plaintiffs' Second Amended Complaint.

127. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 127 of Plaintiffs' Second Amended Complaint.

128. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 128 of Plaintiffs' Second Amended Complaint.

129. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 129 of Plaintiffs' Second Amended Complaint.

130. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 130 of Plaintiffs' Second Amended Complaint.

131. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 131 of Plaintiffs' Second Amended Complaint.

132. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 132 of Plaintiffs' Second Amended Complaint.

133. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 133 of Plaintiffs' Second Amended Complaint.

134. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 134 of Plaintiffs' Second Amended Complaint.

135. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 135 of Plaintiffs' Second Amended Complaint.

136. Defendants admit that they contacted Ann Plainos regarding use of the name. Defendants admit that no written authorization for use of the name was received. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 136 of Plaintiffs' Second Amended Complaint.

137. Defendants deny the allegations in paragraph 137.

138. Defendants deny the allegations in paragraph 138.

139. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 139 of Plaintiffs' Second Amended Complaint.

140. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 140 of Plaintiffs' Second Amended Complaint.

141. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 141 of Plaintiffs' Second Amended Complaint. .

142. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 142 of Plaintiffs' Second Amended Complaint.

143. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 143 of Plaintiffs' Second Amended Complaint. .

144. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 144 of Plaintiffs' Second Amended Complaint.

145. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 145 of Plaintiffs' Second Amended Complaint.

146. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 146 of Plaintiffs' Second Amended Complaint.

147. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 147 of Plaintiffs' Second Amended Complaint.

148. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 148 of Plaintiffs' Second Amended Complaint. .



149. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 149 of Plaintiffs' Second Amended Complaint.

150. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 150 of Plaintiffs' Second Amended Complaint.

151. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 151 of Plaintiffs' Second Amended Complaint.

152. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 152 of Plaintiffs' Second Amended Complaint.

153. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 153 of Plaintiffs' Second Amended Complaint.

154. Defendants admit that the May 30<sup>th</sup> Order was requested by Hutchison with the aid of Carter and that the Order was signed by Judge Weeks. Defendants deny the remainder of the allegations of this paragraph.

155. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 155 of Plaintiffs' Second Amended Complaint.

156. Defendants admit the contents of the Order. Otherwise, Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the remaining allegations of paragraph 156 of Plaintiffs' Second Amended Complaint.

157. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 157 of Plaintiffs' Second Amended Complaint.

158. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 158 of Plaintiffs' Second Amended Complaint.

159. Paragraph 159 does not allege facts which require an admission or denial. However, to the extent that it does, they are denied.

160. Defendants deny the allegations in paragraph 160.

161. Defendants deny that Tsephanyah Hawkins authored the appeal. Defendants admit that Self filed it on behalf of Tsephanyah Hawkins and CDS.

162. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 162 of Plaintiffs' Second Amended Complaint.

163. Defendants admit the allegations in paragraph 163.

164. Defendants deny the allegations in paragraph 164.

165. Defendants deny the allegations in paragraph 165.

166. Defendants deny the allegations in paragraph 166.

167. Defendants deny the allegations in paragraph 167.

168. Defendants deny the allegations in paragraph 168.

169. Defendants deny the allegations in paragraph 169.

170. Defendants deny the allegations in paragraph 170.

171. Defendants deny the allegations in paragraph 171.

172. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 172 of Plaintiffs' Second Amended Complaint.

173. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 162 of Plaintiffs' Second Amended Complaint.

174. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 174 of Plaintiffs' Second Amended Complaint.



175. Paragraph 175 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 175.

176. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 176 of Plaintiffs' Second Amended Complaint.

177. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 177 of Plaintiffs' Second Amended Complaint.

178. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 178 of Plaintiffs' Second Amended Complaint.

179. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 179 of Plaintiffs' Second Amended Complaint.

180. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 180 of Plaintiffs' Second Amended Complaint.

181. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 181 of Plaintiffs' Second Amended Complaint.

182. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 182 of Plaintiffs' Second Amended Complaint.

183. Paragraph 183 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 183.

184. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 184 of Plaintiffs' Second Amended Complaint.

185. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 185 of Plaintiffs' Second Amended Complaint.

186. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 186 of Plaintiffs' Second Amended Complaint.

187. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 187 of Plaintiffs' Second Amended Complaint.

188. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 188 of Plaintiffs' Second Amended Complaint.

189. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 189 of Plaintiffs' Second Amended Complaint.

190. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 190 of Plaintiffs' Second Amended Complaint.

191. Paragraph 191 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 191.

192. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 192 of Plaintiffs' Second Amended Complaint.

193. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 193 of Plaintiffs' Second Amended Complaint.

194. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 194 of Plaintiffs' Second Amended Complaint.

195. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 195 of Plaintiffs' Second Amended Complaint.

196. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 196 of Plaintiffs' Second Amended Complaint.

197. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 197 of Plaintiffs' Second Amended Complaint.

198. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 198 of Plaintiffs' Second Amended Complaint.

199. Paragraph 199 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 199.

200. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 200 of Plaintiffs' Second Amended Complaint.

201. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 201 of Plaintiffs' Second Amended Complaint.

202. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 202 of Plaintiffs' Second Amended Complaint.

203. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 203 of Plaintiffs' Second Amended Complaint.

204. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 204 of Plaintiffs' Second Amended Complaint.

205. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 205 of Plaintiffs' Second Amended Complaint.

206. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 206 of Plaintiffs' Second Amended Complaint.

207. Paragraph 207 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 207.

208. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 208 of Plaintiffs' Second Amended Complaint.

209. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 209 of Plaintiffs' Second Amended Complaint.

210. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 210 of Plaintiffs' Second Amended Complaint.

211. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 211 of Plaintiffs' Second Amended Complaint.

212. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 212 of Plaintiffs' Second Amended Complaint.

213. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 213 of Plaintiffs' Second Amended Complaint.

214. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 214 of Plaintiffs' Second Amended Complaint.

215. Paragraph 215 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 215.

216. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 216 of Plaintiffs' Second Amended Complaint.

217. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 217 of Plaintiffs' Second Amended Complaint.

218. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 218 of Plaintiffs' Second Amended Complaint.

219. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 219 of Plaintiffs' Second Amended Complaint.

220. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 220 of Plaintiffs' Second Amended Complaint.

221. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 221 of Plaintiffs' Second Amended Complaint.

222. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 222 of Plaintiffs' Second Amended Complaint.

223. Paragraph 223 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 223.

224. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 224 of Plaintiffs' Second Amended Complaint.

225. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 225 of Plaintiffs' Second Amended Complaint.

226. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 226 of Plaintiffs' Second Amended Complaint.

227. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 227 of Plaintiffs' Second Amended Complaint.<sup>1</sup>

228. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 228 of Plaintiffs' Second Amended Complaint.

229. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 229 of Plaintiffs' Second Amended Complaint.

230. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 230 of Plaintiffs' Second Amended Complaint.

231. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 231 of Plaintiffs' Second Amended Complaint.

232. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 232 of Plaintiffs' Second Amended Complaint.

233. Paragraph 233 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 233.

234. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 234 of Plaintiffs' Second Amended Complaint.

235. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 235 of Plaintiffs' Second Amended Complaint.

236. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 236 of Plaintiffs' Second Amended Complaint.

237. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 237 of Plaintiffs' Second Amended Complaint.

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<sup>1</sup> Defendants generally deny that they participated in or were part of any conspiracy or that they are liable for the acts of others.

238. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 238 of Plaintiffs' Second Amended Complaint.

239. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 239 of Plaintiffs' Second Amended Complaint.

240. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 240 of Plaintiffs' Second Amended Complaint.

241. Paragraph 241 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 241.

242. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 242 of Plaintiffs' Second Amended Complaint.

243. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 243 of Plaintiffs' Second Amended Complaint.

244. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 244 of Plaintiffs' Second Amended Complaint.

245. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 245 of Plaintiffs' Second Amended Complaint.

246. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 246 of Plaintiffs' Second Amended Complaint.

247. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 247 of Plaintiffs' Second Amended Complaint.

248. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 248 of Plaintiffs' Second Amended Complaint.

249. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 249 of Plaintiffs' Second Amended Complaint.

250. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 250 of Plaintiffs' Second Amended Complaint.

251. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 251 of Plaintiffs' Second Amended Complaint.

252. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 252 of Plaintiffs' Second Amended Complaint.

253. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 253 of Plaintiffs' Second Amended Complaint.

254. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 254 of Plaintiffs' Second Amended Complaint.

255. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 255 of Plaintiffs' Second Amended Complaint.

256. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 256 of Plaintiffs' Second Amended Complaint.

257. Paragraph 257 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 257.

258. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 258 of Plaintiffs' Second Amended Complaint.

259. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 259 of Plaintiffs' Second Amended Complaint.

260. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 260 of Plaintiffs' Second Amended Complaint.

261. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 261 of Plaintiffs' Second Amended Complaint.

262. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 262 of Plaintiffs' Second Amended Complaint.

263. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 263 of Plaintiffs' Second Amended Complaint.

264. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 264 of Plaintiffs' Second Amended Complaint.

265. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 265 of Plaintiffs' Second Amended Complaint.

266. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 266 of Plaintiffs' Second Amended Complaint.

267. Paragraph 267 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 267.

268. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 268 of Plaintiffs' Second Amended Complaint.

269. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 269 of Plaintiffs' Second Amended Complaint.

270. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 270 of Plaintiffs' Second Amended Complaint.

271. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 271 of Plaintiffs' Second Amended Complaint.

272. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 272 of Plaintiffs' Second Amended Complaint.

273. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 273 of Plaintiffs' Second Amended Complaint.

274. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 274 of Plaintiffs' Second Amended Complaint.

275. Paragraph 275 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 275.

276. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 276 of Plaintiffs' Second Amended Complaint.

277. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 277 of Plaintiffs' Second Amended Complaint.

278. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 278 of Plaintiffs' Second Amended Complaint.

279. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 279 of Plaintiffs' Second Amended Complaint.

280. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 280 of Plaintiffs' Second Amended Complaint.

281. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 281 of Plaintiffs' Second Amended Complaint.

282. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 282 of Plaintiffs' Second Amended Complaint.

283. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 283 of Plaintiffs' Second Amended Complaint.

284. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 284 of Plaintiffs' Second Amended Complaint.

285. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 285 of Plaintiffs' Second Amended Complaint.

286. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 286 of Plaintiffs' Second Amended Complaint.

287. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 287 of Plaintiffs' Second Amended Complaint.

288. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 288 of Plaintiffs' Second Amended Complaint.

289. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 289 of Plaintiffs' Second Amended Complaint.

290. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 290 of Plaintiffs' Second Amended Complaint.

291. Paragraph 291 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 291.

292. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 292 of Plaintiffs' Second Amended Complaint.

293. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 293 of Plaintiffs' Second Amended Complaint.

294. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 294 of Plaintiffs' Second Amended Complaint.

295. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 295 of Plaintiffs' Second Amended Complaint.

296. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 296 of Plaintiffs' Second Amended Complaint.

297. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 297 of Plaintiffs' Second Amended Complaint.

298. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 298 of Plaintiffs' Second Amended Complaint.

299. Paragraph 299 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 299.

300. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 300 of Plaintiffs' Second Amended Complaint.

301. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 301 of Plaintiffs' Second Amended Complaint.

302. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 302 of Plaintiffs' Second Amended Complaint.

303. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 303 of Plaintiffs' Second Amended Complaint.



304. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 304 of Plaintiffs' Second Amended Complaint.

305. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 305 of Plaintiffs' Second Amended Complaint.

306. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 306 of Plaintiffs' Second Amended Complaint.

307. Paragraph 307 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 307.

308. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 308 of Plaintiffs' Second Amended Complaint.

309. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 309 of Plaintiffs' Second Amended Complaint.

310. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 310 of Plaintiffs' Second Amended Complaint.

311. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 311 of Plaintiffs' Second Amended Complaint.

312. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 312 of Plaintiffs' Second Amended Complaint.

313. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 313 of Plaintiffs' Second Amended Complaint.

314. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 314 of Plaintiffs' Second Amended Complaint.

315. Paragraph 315 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 315.

316. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 316 of Plaintiffs' Second Amended Complaint.

317. This paragraph does not require the admission or denial of any facts.

318. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 318 of Plaintiffs' Second Amended Complaint.

319. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 319 of Plaintiffs' Second Amended Complaint.

320. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 320 of Plaintiffs' Second Amended Complaint.

321. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 321 of Plaintiffs' Second Amended Complaint.

322. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 322 of Plaintiffs' Second Amended Complaint.

323. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 323 of Plaintiffs' Second Amended Complaint.

324. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 324 of Plaintiffs' Second Amended Complaint.

325. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 325 of Plaintiffs' Second Amended Complaint.

326. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 326 of Plaintiffs' Second Amended Complaint.



327. Paragraph 327 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 327.

328. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 328 of Plaintiffs' Second Amended Complaint.

329. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 329 of Plaintiffs' Second Amended Complaint.

330. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 330 of Plaintiffs' Second Amended Complaint.

331. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 331 of Plaintiffs' Second Amended Complaint.

332. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 332 of Plaintiffs' Second Amended Complaint.

333. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 333 of Plaintiffs' Second Amended Complaint.

334. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 334 of Plaintiffs' Second Amended Complaint.

335. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 335 of Plaintiffs' Second Amended Complaint.

336. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 336 of Plaintiffs' Second Amended Complaint.

337. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 337 of Plaintiffs' Second Amended Complaint.

338. Paragraph 338 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 338.

339. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 339 of Plaintiffs' Second Amended Complaint.

340. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 340 of Plaintiffs' Second Amended Complaint.

341. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 341 of Plaintiffs' Second Amended Complaint.

342. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 342 of Plaintiffs' Second Amended Complaint.

343. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 343 of Plaintiffs' Second Amended Complaint.

344. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 344 of Plaintiffs' Second Amended Complaint.

345. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 345 of Plaintiffs' Second Amended Complaint.

346. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 346 of Plaintiffs' Second Amended Complaint.

347. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 347 of Plaintiffs' Second Amended Complaint.

348. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 348 of Plaintiffs' Second Amended Complaint.

349. Paragraph 349 of Plaintiffs' Second Amended Complaint alleges no facts which require admission or denial but merely incorporates by reference previous paragraphs of Plaintiffs' pleading. In response, Defendants re-allege their answers to said paragraphs as their response to paragraph 349.

350. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 350 of Plaintiffs' Second Amended Complaint.

351. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 351 of Plaintiffs' Second Amended Complaint.

352. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 352 of Plaintiffs' Second Amended Complaint.

353. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 353 of Plaintiffs' Second Amended Complaint.

354. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 354 of Plaintiffs' Second Amended Complaint.

355. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 355 of Plaintiffs' Second Amended Complaint.

356. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 356 of Plaintiffs' Second Amended Complaint.

357. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 357 of Plaintiffs' Second Amended Complaint.

358. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 358 of Plaintiffs' Second Amended Complaint.

359. Defendants have insufficient knowledge to admit or deny and/or form a belief as to the truth of the allegations of paragraph 359 of Plaintiffs' Second Amended Complaint.

360. This paragraph does not require the admission or denial of any facts.

### **AFFIRMATIVE DEFENSES**

By way of affirmative defense, if same be necessary, Defendants would show that:

1. Plaintiffs' claims are barred by Plaintiff(s)' lack of standing and/or capacity.
2. Plaintiff(s)' claims are barred, in whole or in part, by comparative, contributory, superceding or intervening causation.
3. Plaintiff(s)' claims are barred by quasi and equitable estoppel.
4. Plaintiff(s)' claims are barred by Plaintiffs' failure to mitigate damages.
5. Plaintiff(s)' claims are barred by the applicable statute of limitations.

Signed and electronically filed this \_\_\_ day of May, 2006.

Respectfully submitted,

**DEALEY, ZIMMERMANN, CLARK,  
MALOUF & MacFARLANE, P.C.**

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**ATTORNEYS FOR DEFENDANTS  
WHITTEN & YOUNG, P.C.,  
CHARLES C. SELF III, and  
DONALD L. ANDERSON**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served  
\_\_\_\_\_, on the \_\_\_\_\_ day of  
May, 2006, to the following counsel and/or parties of record:

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